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February 13, 2024

VIA ECF

Hon. Philip M. Halpern
U.S. District Court for the Southern District of New York
300 Quarropas Street, Room 530
White Plains, New York 10007-1312

Re: *Soudani v. Soudani*, Case No. 7:23-cv-9905 (PMH) (AEK)

Your Honor:

We represent Plaintiff Eman Soudani (“Plaintiff”) in the above-referenced matter. I write in advance of the February 20, 2024 initial conference and pursuant to Your Honor’s Individual Practices in Civil Cases Rule 2(B) to explain the basis for Plaintiff’s assertion that diversity of citizenship exists in this action pursuant to 28 U.S.C. § 1332.

As alleged in the Complaint (ECF No. 1), Plaintiff is a resident and domiciliary of the State of Colorado. *Id.* ¶ 17. As also alleged in the Complaint, Defendant Mout’z Soudani is a resident of the State of New York. *Id.* ¶ 18. Accordingly, there is complete diversity of citizenship between Plaintiff and Defendant.

The amount in controversy, exclusive of interest and costs, exceeds \$75,000 because the Plaintiff claims that she has suffered compensatory damages in excess of \$75,000 and seeks punitive damages in excess of \$75,000, in an amount to be determined at trial.

Thus, diversity of citizenship exists between the parties and the amount in controversy exceeds \$75,000, such that this court has subject matter jurisdiction over this matter.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Arthur D. Middlemiss', followed by a horizontal line.

Arthur D. Middlemiss

Cc: All Counsel of Record (via ECF)